IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF IOWA EASTERN DUBUQUE DIVISION

)
UNITED STATES OF AMERICA,) Case No. 22-CR-1039-2
)
Plaintiff,)
) DEFENDANT'S MOTION FOR
vs.) REVOCATION OF
) ORDER OF DETENTION
CODI LYN DEMAIO,)
)
Defendant.)

Defendant Codi Lyn Demaio, pursuant to 18 U.S.C. § 3145(b), respectfully requests the District Court to revoke the Order of Detention, and to release Defendant pending sentencing. Defendant states:

- 1. Following a plea hearing, the Magistrate Judge detained Defendant pending sentencing in this matter.
- 2. As discussed in the accompanying Brief, there are exceptional reasons why Ms. Demaio should be released pending sentencing. In particular, Ms. Demaio recently had a child and should be allowed to continue bonding with that child. Additionally, Ms. Demaio has been on pretrial release with no reported issues.
 - 3. A transcript of the plea hearing has been filed.

For the above stated reasons, Defendant Codi Lyn Demaio respectfully requests the District Court to revoke the Order of Detention and to release Defendant pending sentencing.

Respectfully submitted,

__/s/ Michael K. Lahammer___ Michael K. Lahammer Attorney for the Defendant 425 2nd Street SE, Suite 1010 Cedar Rapids, Iowa 52401 (319) 364-1140 michael.lahammer@lahammerlaw.com

CERTIFICATE OF SERVICE

I certify that on the date reported below, I filed the foregoing Motion For Revocation of Order of Detention through the Court's Electronic Filing System, which should cause a copy to be served electronically upon: Office of the United States Attorney, and Devra Hake.

Dated: 07/21/2023 ___/s/ Michael K. Lahammer _____ Michael K. Lahammer